

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CASE NO. 1:22-cv-11421-ADB

JOSE MARIA DeCASTRO,
a/k/a CHILLE DeCASTRO,
a/k/a DELETE LAWZ,
Plaintiff,

v.

JOSHUA ABRAMS a/k/a
ACCOUNTABILITY FOR ALL, KATE
PETER a/k/a MASSHOLE
TROLL MAFIA,
Defendants.

**DEFENDANT JOSHUA ABRAMS' EMERGENCY MOTION TO DISMISS OR,
IN THE ALTERNATIVE, FOR EQUITABLE RELIEF**

Defendant Joshua Abrams a/k/a Accountability for All ("Mr. Abrams") hereby requests, on an emergency basis, that the Court dismiss with prejudice the Complaint of Plaintiff Jose Maria DeCastro, a/k/a Chille DeCastro, a/k/a Delete Lawz ("Mr. DeCastro") and further enter a permanent injunction that Mr. DeCastro shall not threaten and harass Mr. Abrams, all counsel appearing in this action, and all witnesses in this action. In the alternative, Mr. Abrams requests that this Court order that Mr. DeCastro shall not threaten and harass Mr. Abrams, all counsel appearing in this counsel, and all witnesses in this action, and that any violation of that order shall result in dismissal of his claims.

Mr. Abrams joins in the similar motion that was this day filed by co-defendant Kate Peter ("Ms. Peter"). Mr. Abrams adopts the sound factual and legal analysis set out, in detail, in Ms. Peter's motion. As can be seen by the Affidavit filed by Mr. Abrams, Mr. Abrams is similarly a target of Mr. DeCastro's vexatious, abusive and extortionate conduct and is entitled to the same relief.

WHEREFORE, for the reasons stated herein and in Ms. Peter's motion, Mr. Abrams respectfully requests that this Court dismiss Mr. DeCastro's complaint with prejudice, and enter the appropriate injunctive relief to protect Mr. Abrams, all counsel, and all witnesses from harassment.

Respectfully Submitted,

/s/ Joshua N. Garick

Joshua N. Garick (BBO #674603)
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Counsel for Joshua Abrams

Dated: October 20, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and I caused the foregoing document to be served via email upon the following *pro se* litigant and have further mailed him a copy via the U.S. postal service:

Jose Maria DeCastro (Pro Se)
1258 Franklin Street
Santa Monica, CA 90404
iamalaskan@gmail.com

/s/ Joshua N. Garick
Joshua N. Garick (BBO #674603)

Dated: October 20, 2022